

EXHIBIT 4

<p style="text-align: right;">Page 1</p> <p style="text-align: center;">UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK</p> <p>AMERICAN BROADCASTING COMPANIES,) INC., DISNEY ENTERPRISES, INC.,) TWENTIETH CENTURY FOX FILM) CORPORATION, CBS BROADCASTING INC.,) CBS STUDIOS INC., FOX TELEVISION) STATIONS, LLC, FOX BROADCASTING) COMPANY, LLC, NBCUNIVERSAL MEDIA,) LLC, UNIVERSAL TELEVISION LLC, AND) OPEN 4 BUSINESS PRODUCTIONS, LLC,)) PLAINTIFFS,) CASE NO.) 19-cv-7136-LLS v.)) DAVID R. GOODFRIEND AND SPORTS FANS) COALITION NY, INC.,)) DEFENDANTS.)</p> <hr/> <p style="text-align: center;">VIDEOTAPED DEPOSITION OF JEFFREY MORRIS TAKEN REMOTELY VIA ZOOM VIDEOCONFERENCE FRIDAY, DECEMBER 4, 2020</p> <p>Reported by Audra E. Cramer, CSR No. 9901</p> <hr/> <p style="text-align: center;">DIGITAL EVIDENCE GROUP 1730 M Street, NW, Suite 812 Washington, D.C. 20036 (202) 232-0646</p>	<p style="text-align: right;">Page 3</p> <p>1 APPEARANCES OF COUNSEL 2 3 FOR PLAINTIFFS: 4 WILLIAMS & CONNOLLY LLP 5 BY: THOMAS G. HENTOFF, ESQUIRE 6 ANGELICA H. NGUYEN, ESQUIRE 7 725 TWELFTH STREET, NW 8 WASHINGTON, DC 20005 9 (202) 434-5000 10 thentoff@wc.com 11 anguyen@wc.com 12 13 FOR DEFENDANTS: 14 ORRICK, HERRINGTON & SUTCLIFFE LLP 15 BY: ERIN M. B. LEACH, ESQUIRE 16 CAROLINE SIMONS, ESQUIRE 17 LAURA B. NAJEMY, ESQUIRE 18 2050 MAIN STREET, SUITE 1100 19 IRVINE, CALIFORNIA 90401 20 (949) 567-6700 21 eleach@orrick.com 22 csimons@orrick.com lnejemy@orrick.com</p> <p>ALSO PRESENT: ANDY MORTENSEN, VIDEOGRAPHER/HOTSEATER MARGARET TOBEY, NBCUNIVERSAL DANIEL KUMMER, NBCUNIVERSAL</p>
<p style="text-align: right;">Page 2</p> <p>1 VIDEOTAPED DEPOSITION OF JEFFREY MORRIS, 2 TAKEN REMOTELY VIA ZOOM ON BEHALF OF THE DEFENDANTS, 3 AT 11:11 A.M. EST, FRIDAY, DECEMBER 4, 2020, BEFORE 4 AUDRA E. CRAMER, CSR NO. 9901, PURSUANT TO NOTICE. 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22</p>	<p style="text-align: right;">Page 4</p> <p>1 I N D E X 2 WITNESS 3 JEFFREY MORRIS 4 5 EXAMINATION PAGE 6 BY MS. LEACH 7 7 8 E X H I B I T S 9 NO. PAGE DESCRIPTION 10 Exhibit 1 168 EMAIL NBC0000184 11 12 13 QUESTIONS INSTRUCTED BY COUNSEL NOT TO ANSWER 14 PAGE LINE 15 18 1 16 18 7 17 18 19 20 21 22</p>

<p style="text-align: right;">Page 169</p> <p>1 Q. Have you ever seen this document</p> <p>2 before?</p> <p>3 A. Yes, I assume I have.</p> <p>4 Q. Do you know what it is?</p> <p>5 A. Yeah. It's an email.</p> <p>6 Q. Okay. Did you send the email?</p> <p>7 A. Yes.</p> <p>8 Q. And you received the original email</p> <p>9 from a Nick Evansky?</p> <p>10 A. Yes, that's correct.</p> <p>11 Q. Is he an employee at NBC?</p> <p>12 A. Yes, he is.</p> <p>13 Q. What did he email you?</p> <p>14 A. From the looks of this, he sent me an</p> <p>15 email with a link to a article regarding AT&T</p> <p>16 donating \$500,000 to Locast.</p> <p>17 Q. Do you remember if when you received</p> <p>18 that email, you had already known about the</p> <p>19 donation?</p> <p>20 A. I don't remember, no.</p> <p>21 Q. Do you remember when you first learned</p> <p>22 about Locast?</p>	<p style="text-align: right;">Page 171</p> <p>1 BY MS. LEACH:</p> <p>2 Q. You can answer.</p> <p>3 A. Yes, I receive emails from them.</p> <p>4 Q. What was your response to Mr. Evansky's</p> <p>5 email?</p> <p>6 A. I wrote "Jerks" with an exclamation</p> <p>7 mark.</p> <p>8 Q. Who were the jerks that you were</p> <p>9 referring to?</p> <p>10 A. If I recall at the moment, probably</p> <p>11 AT&T was a jerk.</p> <p>12 Q. Why, if you recall, did you believe</p> <p>13 that AT&T was a jerk for donating to Locast?</p> <p>14 A. Because Locast is a -- at the time my</p> <p>15 opinion was they were an unlicensed distributor</p> <p>16 of our content, and our agreements with our</p> <p>17 licensed distributors protect our quality of the</p> <p>18 content that we invest a lot of money in</p> <p>19 creating and take a lot of pride in creating and</p> <p>20 distributing.</p> <p>21 Q. At the time did you believe that Locast</p> <p>22 was for-profit?</p>
<p style="text-align: right;">Page 170</p> <p>1 A. I don't remember specifically. I think</p> <p>2 it was 2018.</p> <p>3 Q. You don't remember if it was the latter</p> <p>4 portion of 2018 versus the beginning of 2018?</p> <p>5 A. I don't remember.</p> <p>6 Q. How did you learn about Locast?</p> <p>7 A. I'm guessing I learned about it through</p> <p>8 the trade organizations like this one.</p> <p>9 Q. Like this one?</p> <p>10 A. Like the one referred to in this</p> <p>11 article -- in this document here.</p> <p>12 Q. Broadcasting Cable?</p> <p>13 A. Yes.</p> <p>14 Q. That's a trade organization?</p> <p>15 A. Trade publication. Excuse me.</p> <p>16 Q. Okay. Trade publication.</p> <p>17 So Broadcasting Cable, trade</p> <p>18 publication, emails -- you receive emails from</p> <p>19 that publication?</p> <p>20 MR. HENTOFF: Objection to the form of</p> <p>21 the question.</p> <p>22</p>	<p style="text-align: right;">Page 172</p> <p>1 A. I don't -- I don't -- I don't know if</p> <p>2 that entered my thinking. It was more about</p> <p>3 the -- you know, another -- a lack of control on</p> <p>4 our -- the quality of our content.</p> <p>5 Q. So are -- in your view, are nonprofit</p> <p>6 organizations that rebroadcast content -- NBC</p> <p>7 content jerks?</p> <p>8 A. No.</p> <p>9 MR. HENTOFF: Objection to the form of</p> <p>10 the question. Mischaracterizes his testimony.</p> <p>11 THE WITNESS: Can you repeat that.</p> <p>12 BY MS. LEACH:</p> <p>13 Q. I think we got the -- I got the answer.</p> <p>14 Thank you.</p> <p>15 MR. HENTOFF: What was the answer, I'm</p> <p>16 sorry.</p> <p>17 MS. LEACH: Maybe Audra can read back</p> <p>18 the transcript.</p> <p>19 MR. HENTOFF: The answer was, "Can you</p> <p>20 repeat that."</p> <p>21 MS. LEACH: Before that I thought I</p> <p>22 heard -- okay. So can you repeat the question</p>

<p style="text-align: right;">Page 173</p> <p>1 to the witness.</p> <p>2 (Record read as follows:</p> <p>3 "Question: So, in your</p> <p>4 view, are nonprofit organizations</p> <p>5 that rebroad content -- NBC</p> <p>6 content jerks?")</p> <p>7 MR. HENTOFF: Same objection.</p> <p>8 THE WITNESS: Yeah, I think the answer</p> <p>9 is no, although I don't have a lot of experience</p> <p>10 with them.</p> <p>11 BY MS. LEACH:</p> <p>12 Q. Is AT&T a competitor to the O&Os?</p> <p>13 MR. HENTOFF: Objection to the form of</p> <p>14 the question.</p> <p>15 THE WITNESS: I don't think of them as</p> <p>16 a competitor, no.</p> <p>17 BY MS. LEACH:</p> <p>18 Q. You called them jerks because they</p> <p>19 donated money to what you view as a competitor?</p> <p>20 A. I --</p> <p>21 MR. HENTOFF: Excuse me.</p> <p>22 Mischaracterizes the testimony. Asked</p>	<p style="text-align: right;">Page 175</p> <p>1 anything else we need to get on the record</p> <p>2 before we go off?</p> <p>3 MR. HENTOFF: I think for the</p> <p>4 Plaintiffs, I'm satisfied that I put things on</p> <p>5 the record that I need to.</p> <p>6 THE VIDEOGRAPHER: Okay. The time is</p> <p>7 4:14 p.m. Eastern, and this concludes today's</p> <p>8 video deposition of Jeffrey Morris.</p> <p>9 (Whereupon, at 4:14 p.m. EST</p> <p>10 the deposition of JEFFREY MORRIS</p> <p>11 was adjourned.)</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
<p style="text-align: right;">Page 174</p> <p>1 and answered.</p> <p>2 MS. LEACH: If we could just stick to</p> <p>3 form objections, that would be great.</p> <p>4 THE WITNESS: Yeah, I don't think</p> <p>5 that's accurate of what I said. What I said was</p> <p>6 I think in this case I referred to AT&T as a</p> <p>7 jerk because they were providing \$500,000 to a</p> <p>8 company that was unlicensed distributor of our</p> <p>9 content, and, therefore, we were losing the</p> <p>10 ability to, you know, ensure the quality of our</p> <p>11 content was going to be maintained throughout</p> <p>12 the distribution chain.</p> <p>13 BY MS. LEACH:</p> <p>14 Q. Okay. That's regardless of their</p> <p>15 nonprofit status?</p> <p>16 MR. HENTOFF: Objection to the</p> <p>17 question -- to the form of the question.</p> <p>18 THE WITNESS: That's correct.</p> <p>19 MS. LEACH: I have nothing further.</p> <p>20 MR. HENTOFF: I have no questions.</p> <p>21 Thank you very much.</p> <p>22 THE VIDEOGRAPHER: Okay. Is there</p>	<p style="text-align: right;">Page 176</p> <p>1 STATE OF CALIFORNIA)</p> <p>2 COUNTY OF LOS ANGELES) SS.</p> <p>3</p> <p>4 I, AUDRA E. CRAMER, CSR No. 9901, in and for the</p> <p>5 State of California, do hereby certify:</p> <p>6 That, prior to being examined, the witness named</p> <p>7 in the foregoing deposition was by me duly sworn to</p> <p>8 testify the truth, the whole truth and nothing but the</p> <p>9 truth;</p> <p>10 That said deposition was taken down by me in</p> <p>11 shorthand at the time and place therein named, and</p> <p>12 thereafter reduced to typewriting under my direction,</p> <p>13 and the same is a true, correct and complete transcript</p> <p>14 of said proceedings;</p> <p>15 I further certify that I am not interested in the</p> <p>16 event of the action.</p> <p>17 Witness my hand this ____ day of _____,</p> <p>18 2020.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p style="text-align: right;">_____ Certified Shorthand Reporter for the State of California</p>

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<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>1 Jeffrey Morris, c/o WILLIAMS & CONNOLLY LLP 2 725 TWELFTH STREET, NW WASHINGTON, DC 20005</p> <p>3</p> <p>4 Case: American Broadcasting Companies, Inc., et al. v. Goodfriend, et al. Date of deposition: December 4, 2020 5 Deponent: Jeffrey Morris</p> <p>6</p> <p>7 Please be advised that the transcript in the above 8 referenced matter is now complete and ready for signature. 9 The deponent may come to this office to sign the transcript, 10 a copy may be purchased for the witness to review and sign, 11 or the deponent and/or counsel may waive the option of 12 signing. Please advise us of the option selected. 13 Please forward the errata sheet and the original signed 14 signature page to counsel noticing the deposition, noting the 15 applicable time period allowed for such by the governing 16 Rules of Procedure. If you have any questions, please do 17 not hesitate to call our office at (202)-232-0646.</p> <p>18</p> <p>19</p> <p>20 Sincerely, Digital Evidence Group 21 Copyright 2020 Digital Evidence Group Copying is forbidden, including electronically, absent 22 express written consent.</p> </div> <div style="width: 45%; text-align: right;"> <p>1 Digital Evidence Group, LLC 2 1730 M Street, NW, Suite 812 3 Washington, D.C. 20036 4 (202)232-0646</p> <p>5</p> <p>6 ERRATA SHEET</p> <p>7</p> <p>8 Case: American Broadcasting Companies, Inc., et al. v. Goodfriend, et al. 9 Witness Name: Jeffrey Morris 10 Deposition Date: December 4, 2020 11 Page No. Line No. Change</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21 _____ Signature Date</p> <p>22</p> </div> </div>	<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>1 Digital Evidence Group, L.L.C. 1730 M Street, NW, Suite 812 2 Washington, D.C. 20036 (202) 232-0646</p> <p>3</p> <p>4 SIGNATURE PAGE Case: American Broadcasting Companies, Inc., et al. v. Goodfriend, et al. 5 Witness Name: Jeffrey Morris Deposition Date: December 4, 2020</p> <p>6</p> <p>7 I do hereby acknowledge that I have read 8 and examined the foregoing pages 9 of the transcript of my deposition and that:</p> <p>10 (Check appropriate box): () The same is a true, correct and 11 complete transcription of the answers given by me to the questions therein recorded. 12 () Except for the changes noted in the attached Errata Sheet, the same is a true, 13 correct and complete transcription of the answers given by me to the questions therein 14 recorded.</p> <p>15</p> <p>16 _____ DATE WITNESS SIGNATURE</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21 _____ DATE NOTARY</p> <p>22</p> </div> <div style="width: 45%;"></div> </div>